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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SUMTER COUNTY  
Court of Common Pleas  
R. Kirk Griffin, Circuit Court Judge

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NOV 13 2025

SC Court of Appeals

Civil Action No. 2019-CP-43-02375

Appellate Case No. 2023-000074

Ex Parte: Liberty Mutual Insurance Company and Horace Mann Property and Casualty Insurance Company, Respondents,

In Re:

Howell D. Thompson and Tara L. Thompson,

Appellants,

v.

Carlos D. Toney

Defendant

**RESPONDENT HORACE MANN PROPERTY AND CASUALTY INSURANCE  
COMPANY'S MOTION FOR EXTENSION OF TIME**

Respondent Horace Mann Property and Casualty Insurance Company (hereinafter "Horace Mann") respectfully requests a fifteen (15) day extension of time to file its Return to Appellants' Petition for Rehearing and Suggestion of Rehearing En Banc, pursuant to Rule 240 of the South Carolina Appellate Court Rules. The current deadline for Respondent Horace Mann's Return would be November 20, 2025. With a fifteen (15) day extension, the new deadline for Respondent Horace Mann's Return would be December 5, 2025. Respondent Horace Mann requests this

extension because of scheduling issues and professional obligations of counsel. This is Respondent Horace Mann's first request for an extension of these deadlines for Respondent's Return. Respondent Horace Mann requests that the current deadline be held in abeyance until this Court issues an Order on this Motion. Furthermore, the fifteen (15) day extension will not prejudice the Appellants or affect their legal rights. Counsel for Appellants and Counsel for Respondent Liberty Mutual Insurance Company consent to this extension request.

Respectfully submitted,

BREHMER LAW FIRM, LLC

By: *s/Andrew C. Brehmer*

Karl S. Brehmer

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**ATTORNEYS FOR RESPONDENT  
HORACE MANN PROPERTY AND  
CASUALTY INSURANCE COMPANY**

Columbia, South Carolina  
November 13, 2025

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**PROOF OF SERVICE**

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I certify that a true copy of the Motion for Extension of Time in this case has been served on the following, this 13<sup>th</sup> day of November, 2025, by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to Rule 262 of the South Carolina Appellate Court Rules and the May 6, 2022, Order of the South Carolina Supreme Court (Appellate Case No. 2020-000447):

*Served email addresses to appear on following page.*

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SC Court of Appeals

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